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10 *Attorneys for Defendant Pan-American Life Insurance Company*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF MONTANA**  
13 **MISSOULA DIVISION**

14 JANET HEINZE,

15 Plaintiff,

16 v.

17 PAN-AMERICAN LIFE INSURANCE  
18 COMPANY and JOHN DOES 1-4

19 Defendants.  
20

Cause No. 9:16-CV-00104-DWM

21 **STIPULATION FOR**  
22 **DISMISSAL OF ALL CLAIMS**  
23 **WITH PREJUDICE**

24 IT IS HEREBY STIPULATED, by and between the parties hereto, through  
25 their respective counsel of record, pursuant to Rule 41, Federal Rules of Civil  
26 Procedure, that all of the claims alleged in the above-captioned action have been fully  
27 and finally compromised and settled on the merits, and counsel request the Court's  
28 Order dismissing the above-captioned action with prejudice, each party to bear its

1 own costs and fees. A proposed *Order Dismissing All Claims with Prejudice* is  
2 attached herewith for the Court's consideration.  
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4 MOORE, COCKRELL,  
5 GOICOECHEA & JOHNSON, P.C.  
6

7 Dated: October 11, 2016

/s/ Dale R. Cockrell

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11 *Attorneys for Defendant Pan-American*  
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14 BLIVEN & EVANS TRIAL LAWYERS,  
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16 Dated: October 11, 2016

/s/ Alex K. Evans

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21 *Attorneys for Plaintiff Janet Heinze*  
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true copy of the foregoing document was served upon the following individuals by the means designated below:

<input checked="" type="checkbox"/> U.S. Mail	Alex K. Evans
<input type="checkbox"/> CM/ECF	Michael A. Bliven
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<input type="checkbox"/> Hand-Delivery	278 Fourth Avenue E.N.
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*Attorneys for Plaintiff Janet Heinze*

Dated this 11<sup>th</sup> day of October, 2016.

/s/Dale R. Cockrell  
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